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****E-filed 8/30/06****

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Attorneys for **Plaintiff**
Synapsis, LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION

SYNAPSIS, LLC, a Nevada Limited Liability
Company,

Plaintiffs

vs.

EVERGREEN DATA SYSTEMS, INC., a
California Corporation, BRUCE R.
MCALLISTER, an individual, STEVEN J.
DEMARTINI, an individual, IRELAND SAN
FILIPPO, LLP, a California limited liability
partnership, and DOES 1 through 10, inclusive,,

Defendants.

Case No: C 05-01524 JF

**[PROPOSED] ORDER GRANTING
MOTION FOR ADMINISTRATIVE
RELIEF RE FILING DOCUMENTS
UNDER SEAL PURSUANT TO THE
NOVEMBER 17, 2005 PROTECTIVE
ORDER**

DATE: September 8, 2006

TIME: 9:00 a.m.


CTRM: 3

Hon. Jeremy Fogel, Judge Presiding

1 FOR GOOD CAUSE SHOWN,
2 PLAINTIFF'S MOTION FOR ADMINISTRATIVE RELIEF IS HEREBY
3 GRANTED. The Memorandum of Points and Authorities Filed Under Seal and The
4 Declaration of Jeffrey F. Sax and Exhibits A, and G-M attached thereto, submitted
5 in opposition to Defendant Ireland San Filippo's motion for summary judgment
6 scheduled for hearing on September 8, 2006 shall be filed under seal, effective on
7 August 18, 2006.

8 Dated: 8/31, 2006

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Hon. Jeremy Fogel,
United States District Judge

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
 3) ss.
 4 COUNTY OF LOS ANGELES)

5 I am employed in the County of Los Angeles, State of California. I am over the age
 6 of eighteen (18) years and not a party to the within action; my business address is: 333
 South Hope Street, 36th Floor, Los Angeles, CA 90071.

7 On May 30, 2006, I served the following described as **DECLARATION OF**
 8 **WILLIAM AKEL IN OPPOSITION TO MOTION BY IRELAND SAN FILIPPO,**
 9 **LLP FOR SUMMARY JUDGMENT** on the interested parties in this action by placing a
 true copy thereof enclosed in a sealed envelope addressed as follows:

10 Manuel A. Martinez, Esq.
 11 Stein & Lubin LLP
 600 Montgomery Street, Ste 1200
 12 San Francisco, California 94111
 Facsimile: 415-981-4343

Daniel C. DeCarlo, Esq.
 Lewis, Brisbois, Bisgaard & Smith
 221 N. Figueroa St., 14th Floor
 Los Angeles, CA 90012
 Facsimile: 213-250-7900

13 Shawn Toliver, Esq.
 14 Lewis, Brisbois, Bisgaard & Smith
 15 One Sansome Street, Suite 1400
 San Francisco, CA 94104
 16 Facsimile: 415-434-0882

17 **[X] (MAIL)** I am readily familiar with the firm's practice of collection and processing
 18 correspondence by mail. Under that practice it would be deposited with U.S. postal
 19 service on that same day with postage fully prepaid at Los Angeles, California in
 20 the ordinary course of business. I am aware that on motion of the party served,
 service is presumed invalid if postal cancellation date or postage meter date is
 more than one day after date of deposit for mailing in affidavit.

21 **[X] (BY FAX)** I caused such document to be sent by facsimile to the offices of the
 22 addressees.

23 **[x] (FEDERAL)** I declare that I am employed in the offices of a member of this Court
 24 at whose direction the service was made.

25 Executed on May 30, 2006 at Los Angeles, California.

26 _____
 27 Tobi Dragert
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